

EMERY CELLI BRINCKERHOFF & ABADY LLP

RICHARD D. EMERY
ANDREW G. CELLI, JR.
MATTHEW D. BRINCKERHOFF
JONATHAN S. ABADY
EARL S. WARD
ILANN M. MAAZEL
HAL R. LIEBERMAN
DANIEL J. KORNSTEIN
O. ANDREW F. WILSON
ELIZABETH S. SAYLOR
KATHERINE ROSENFELD
DEBRA L. GREENBERGER
ZOE SALZMAN
SAM SHAPIRO

ATTORNEYS AT LAW
600 FIFTH AVENUE AT ROCKEFELLER CENTER
10TH FLOOR
NEW YORK, NEW YORK 10020

TEL: (212) 763-5000
FAX: (212) 763-5001
www.ecbalaw.com

DIANE L. HOUK
EMMA L. FREEMAN
DAVID BERMAN
HARVEY PRAGER
SCOUT KATOVICH
NICK BOURLAND
ANDREW K. JONDAHL
ANANDA BURRA
MAX SELVER

June 3, 2020

By ECF

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Centre Street, Room 2202
New York, New York 10007

Re: *Accent Delight Int'l Ltd. et al. v. Sotheby's et al.*, No. 18-CV-9011

Dear Judge Furman:

Plaintiffs write to update the Court on the Parties' efforts to resolve their discovery dispute about the search terms "Heller" and "Christie!", ECF No. 173, as directed by the Court at the May 28, 2020 status conference, ECF No. 174.

The Parties exchanged proposals for Boolean connectors to limit hit counts and Plaintiffs have worked extensively with their document vendor to create Boolean terms, both using spot checks of the documents and through automated means. These efforts have been unsuccessful, despite many hours of attorney and vendor time.

In the interest of limiting further time and expense litigating these terms, Plaintiffs are withdrawing their objection to running the original search terms and have agreed to run the terms within the following date-range limits that were previously proposed by Defendants:

Heller: November 1, 2011 to February 1, 2012; December 1, 2014 to March 25, 2016.

Christie's and Christie!: November 1, 2014 to March 25, 2016.

Respectfully submitted,

/s/

Daniel J. Kornstein

c. All counsel of record (by ECF)